



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

LS  
F. #2024R00485

*271 Cadman Plaza East  
Brooklyn, New York 11201*

April 28, 2025

By ECF and E-mail

Saul Warren Bienenfeld  
Bienenfeld Law  
680 Central Avenue, Suite 108  
Cedarhurst, NY 11516

Jeffrey H. Lichtman  
Law Offices of Jeffrey Lichtman  
441 Lexington Avenue, Suite 504  
New York, NY 10017

Barry Kamins  
Aidala, Bertuna & Kamins PC  
546 Fifth Avenue, Sixth Floor  
New York, NY 10036

Re: United States v. Jacob Israel Walden  
Criminal Docket No. 24-521 (GRB)

Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, enclosed please find the government's production of additional discovery in the above-captioned case. The discovery has been transmitted by USAfx, a file-sharing system. Please promptly download the materials and confirm in writing to the government that you were able to do so. The government also requests reciprocal discovery from the defendant.

Please note that, as before, the enclosed material is considered Sensitive Discovery Material ("SDM") as that term is defined in the January 24, 2025 Protective Order in this matter. See ECF No. 40. As such, PDF files containing SDM have been marked as "Sensitive" on each page, and non-PDF files have been marked as "Sensitive" in the corresponding file folder or filename. In addition, certain documents have been redacted to remove the personally identifiable information of known or suspected minor victims.

I. The Government's Discovery

A. Documents and Tangible Objects

Please find enclosed the following additional materials:

- Subpoena returns from Google, which are Bates-numbered DOJ\_0000763 to DOJ\_0000937.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

JOHN J. DURHAM  
United States Attorney

By: /s/ Leonid Sandlar  
Leonid Sandlar  
Trial Attorney  
(718) 254-6879

Enclosures (via USAfx link)

cc: Clerk of the Court (GRB) (by ECF) (without enclosures)